Message

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Sent: 8/4/2021 4:21:16 PM

To: Waterhouse, Carlton [Waterhouse.Carlton@epa.gov]; Breen, Barry [Breen.Barry@epa.gov]

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Subject: cheat sheet for Oak Ridge risk based discharge limits

Attachments: fed fac Oak Ridge cheat sheet 8.4.21.docx

Importance: High

Hello Carlton and Barry,

Per your request from our discussion on July 30, I am attaching a cheat sheet on the Oak Ridge risk assessment regarding discharge limits into Bear Creek. I have broken the cheat sheet into 2 parts:

- 1. **Issues with DOE Discharge Limits in 2021 FS Appendix K** explains how DOE came up with proposed discharge limits in the Focused FS and why their approach is incorrect for complying with the Clean Water Act's Water Quality-Based Effluent Levels (WQBELs) as an ARAR at Bear Creek.
- 2. **Instructions for DOE** provides an explanation on how DOE should develop WBELs and discharge limits for Bear Creek.
 - a. **Approach** Describes the general procedure DOE should be taking.
 - b. **Methods** Describes the input parameters DOE should be using when running the EPA PRG calculator when developing WBELs.
 - c. **Results** Provides a table of WQBEL and discharge limits I developed using the CWA methodology with the EPA PRG calculator. The table assumes that DOE does not conduct a fish consumption study to support revising the default fish consumption rate with site-specific information.

Please let me know if you have any comments or questions.